

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

**CASE NO: 22-cv-21921-KMW**

**ME4KIDZ, LLC,  
an Arizona Limited Liability Company,**

**Plaintiff,**

**vs.**

**ZOHAR MEDICAL HOLDING, LLC, a  
Florida Limited Liability Company,  
ICU PRODUCTION, INC, a California  
corporation and KAREN ZOHAR, an individual,**

**Defendants.**

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**MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF**

COMES NOW the undersigned counsel for Plaintiff in the above referenced matter, hereby files this Motion to Withdraw as Counsel for the Plaintiff, ME4KIDZ, LLC and in support thereof states as follows:

1. On or about June 6, 2022, Kelley Kronenberg (“KK”) was retained as counsel for ME4KIDZ, LLC, and the parties entered into a Contract for Representation which outlines the conditions of KK’s representation of the Plaintiff.
2. Since that time, KK has represented Plaintiff in this litigation.
3. Recently, irreconcilable differences have arisen between KK and Plaintiff, and there are no circumstances that would enable KK to competently and zealously represent Plaintiff in this litigation.
4. Pursuant to the executed Contract for Representation, consent has been given by Plaintiff for the firm to withdraw upon such circumstances.

5. In addition, KK has informed Plaintiff about its intention to file this Motion to Withdraw in this case and Plaintiff has consented to same. Plaintiff may be served at the following mailing and email address: ME4KIDZ, LLC., Attn: Pete Nassos, Vice President, 924 N. Country Club Drive, Building 3, Mesa, AZ 85201-4108 pete@me4kidz.com.

6. Further, the undersigned has notified counsel for the Defendants, Zohar Medical Holding, LLC and ICU Production, Inc., who have stated that they have no objection to same.

WHEREFORE, Kelley Kronenberg requests that this Court enter an Order allowing it to withdraw as counsel for Plaintiff, ME4KIDZ, LLC, and further stay this entire litigation for 60 days in order for Plaintiff to retain new counsel.

DATED this 7<sup>th</sup> day of December, 2022.

KELLEY KRONENBERG  
*Counsel for Plaintiff*  
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By: /s/ Dennis S. Klein  
DENNIS S. KLEIN  
Florida Bar No.: 91767  
dklein@kelleykronenberg.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 7<sup>th</sup> day of December, 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record, as follows: Jeremy C. Sahn, Esq., *jsahn@beckerlawyers.com* and *ggellman@beckerlawyers.com*, Becker, 1 East Broward Blvd., Suite 1800, Fort Lauderdale, FL 33301, *counsel for Zohar Medical Holding, LLC* and Lawren A. Zann, Esq., *lawren.zann@gmlaw.com*, *Sharon.urias@gmlaw.com*, Greenspoon Marder LLP, 200 E. Broward Blvd., Suite 1800, Fort Lauderdale, FL 33301, *counsel for ICU Production, Inc.*

By: /s/ Dennis S. Klein  
DENNIS S. KLEIN